

LEWIS & LLEWELLYN LLP
Paul T. Llewellyn (Bar No. 216887)
pllewellyn@lewisllewellyn.com
Nicolas V. Saenz (Bar No. 284087)
nsaenz@lewisllewellyn.com
Tobias Snyder (Bar No. 289095)
tsnyder@lewisllewellyn.com
601 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 800-0590
Facsimile: (415) 390-2127

Attorneys for Plaintiff
TOP AGENT NETWORK, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TOP AGENT NETWORK, INC.,

Plaintiff,

v.

NATIONAL ASSOCIATION OF REALTORS;
CALIFORNIA ASSOCIATION OF
REALTORS, INC.; SAN FRANCISCO
ASSOCIATION OF REALTORS,

Defendants.

CASE NO. 3:20-cv-03198 VC

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING TIME TO FILE
AMENDED COMPLAINT AND
BRIEFING SCHEDULE REGARDING
MOTION TO DISMISS**

Judge: Hon. Vince Chhabria

Complaint Filed: May 11, 2020

Pursuant to Civil Local Rules 6-1, 6-2 and 7-12, the parties hereby stipulate to extend the time for Plaintiff to file an amended complaint as a matter of course and the deadline for Defendants to answer, move, or otherwise respond to the amended complaint.

RECITALS

WHEREAS, Plaintiff filed its Complaint in this action on May 11, 2020 (ECF No. 1);

WHEREAS, on June 1, 2020, pursuant to the parties' stipulation, the Court extended the time for Defendants to answer, move, or otherwise respond to the Complaint (ECF No. 30);

WHEREAS, pursuant to the Court's order, Defendants filed their motions to dismiss the Complaint on July 10, 2020 (ECF Nos. 40-41), and a hearing on these motions is currently set for September 17, 2020 at 10:00 am;

WHEREAS, Plaintiff currently has until July 31, 2020 to amend its complaint as a matter of course;

WHEREAS, the parties agree that there is good cause to extend the time for Plaintiff to amend its complaint as a matter of course;

WHEREAS, the parties agree that there is good cause to extend the time for Defendants to answer, move, or otherwise respond to Plaintiff's amended complaint once filed;

WHEREAS, this stipulation and proposed order, if granted, would alleviate the need for the September 17, 2020 hearing on Defendants' motion to dismiss;

THEREFORE, the parties, through their counsel, hereby stipulate as follows:

1. Plaintiff's time to amend its complaint as a matter of course is extended until August 21, 2020;
2. Defendants' time to answer, move, or otherwise respond to the amended complaint is extended until October 2, 2020;

3. Plaintiff's opposition to any motion to dismiss filed by Defendants is due October 23, 2020;
4. Defendants' reply in support of any motion to dismiss is due November 6, 2020.

IT IS SO STIPULATED.

DATED: July 23, 2020

LEWIS & LLEWELLYN LLP

By /s/ Paul T. Llewellyn

Paul T. Llewellyn
pllewellyn@lewisllewellyn.com
Nicolas V. Saenz
nsaenz@lewisllewellyn.com
Tobias George Snyder
tsnyder@lewisllewellyn.com
601 Montgomery St., Suite 2000
San Francisco, CA 94111
Telephone: 415-800-0590

*Attorneys for Plaintiff
Top Agent Network, Inc.*

DATED: July 23, 2020

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Ethan Glass

Ethan Glass (Bar No. 216159)
ethanglass@quinnemanuel.com
Michael D. Bonanno (*pro hac vice* pending)
mikebonanno@quinnemanuel.com
1300 I St. NW, Suite 900
Washington, District of Columbia 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

*Attorneys for Defendants
National Association of REALTORS®,
California Association of REALTORS®, Inc., and
San Francisco Association of REALTORS®*

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Date: 7/27/2020

A handwritten signature in black ink, consisting of a large 'V' followed by a horizontal line and a small flourish.

Hon. Vince Chhabria
United States District Judge

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this stipulation has been obtained from each signatory herein.

By: /s/ Paul T. Llewellyn
Paul T. Llewellyn